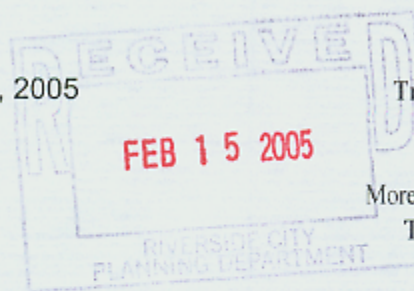




February 9, 2005



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Mr. Craig Aaron, Principal Planner
Planning and Building Development,
3900 Main Street, 3rd Floor
Riverside, CA 92522

Subject: Notice of Availability of a Draft EIR for the City of Riverside General Plan

Dear Mr. Aaron:

The City of Moreno Valley Transportation Division has reviewed the subject draft EIR and has several comments. The comments identify issues with the Traffic Study for the City of Riverside General Plan Update Circulation Element as they affect or may affect the City of Moreno Valley. Typos, inaccuracies, or discrepancies that do not represent an issue that poses a potential impact to the City of Moreno Valley are not mentioned here.

Both the Traffic Study (Meyer Mohaddes, November 2004) and the Transportation/Traffic Section of the EIR were reviewed, since there were significant differences between the two.

1. The analysis is limited to intersections and roadways in the City of Riverside and its Sphere of Influence, and does not consider any impacts on adjacent cities. Build-out of the Riverside General Plan is likely to impact the City of Moreno Valley, given that:
 - a. The Land Use Element of the proposed General Plan states that the Sycamore Canyon Business Park and Canyon Springs area of the City (immediately adjacent to the City of Moreno Valley) are "an excellent location for intensive commercial and industrial development;" and
 - b. The Future freeway analysis in the Transportation/Traffic section of the EIR (Table 5.15-8) indicates that the daily volumes on the I-215 south of the SR-60 (adjacent to the City of Moreno Valley) will increase by 65% to 193% compared to existing freeway volumes, with trips starting or ending in Riverside comprising up to 18% of that traffic.
2. The source of the future freeway volumes on Table 5.15-8 is not explained. The volumes on this table do not match the volumes on the exhibit in the Traffic Study labeled "General Plan Buildout Daily Traffic Volume."
3. Neither the Transportation/Traffic Section of the EIR nor the Traffic Study (Appendix H) provides any technical supporting data for the intersection analysis (peak hour volumes, lane geometrics, etc.), and the technical appendix to the Traffic Study (which, presumably, contains the intersection worksheets) was not provided. Therefore, we were unable to verify the findings of the study related to the intersection level of service analysis.
4. The Traffic Study states that funded transportation improvements are assumed in the Future Build-out analysis. It would be helpful to see a figure or a table summary of these improvements.

5. There is no indication of where the future Build-out land uses are projected to develop (i.e., build-out land use and square footage compared to existing). It would be helpful to understand where the future development within the City is expected to be, and the quantity. A traffic analysis zone (TAZ) map and a summary of existing vs. future land use and trip generation by TAZ would be helpful.
6. The Traffic Study states that roadway Level of Service "E" and "F" conditions may be potentially significant, but does not mention mitigation. The Transportation/Traffic Section of the EIR states that only the LOS "F" conditions are considered significant. The only mitigation measure provided is to monitor those roadways, and identify potential improvements when the Level of Service approaches LOS "E." The study should instead recommend a roadway network that will support the land use plan, as required by state law.
7. The CETAP alignment for the Main Street / Pigeon Pass connection crosses through a portion of the County of Riverside that is located within the City of Riverside Sphere of Influence in the upper northeast corner of the City. Based on review of future conditions exhibits in the Circulation Element (Exhibits 9 and 10), it is clear that the Main Street / Pigeon Pass connection was assumed in the regional modeling. However, Exhibit 11, which shows the City of Riverside Proposed Roadway Functional Classifications does not reflect the Main Street / Pigeon Pass connection.
8. The Land Use Element of the draft General Plan contains a discussion of the Sycamore Canyon Business Park / Canyon Springs neighborhood. That discussion states the goal of encouraging the Sycamore Canyon area of the city to be developed as a significant employment center with job-intensive businesses, rather than warehousing and low-intensity industrial. The land use element also states that significant commercial development is foreseen for the Canyon Springs area.

The EIR does not provide any detail about or comparison of the number of existing vs. future units of development.

The General Plan Update includes a change in zoning designations, but does not make it clear how or if density or allowed land uses will change. The most prominent changes in the Sycamore Canyon Business Park and Canyon Springs area of the city include:

- Zone Changes Figure 22 - C-2 (Restricted Commercial) zone designation will change to CR (Commercial Retail). CR zoning allows a .50 FAR. The previous zoning document does not specify a maximum FAR.
- Zone Changes Figure 24 - MP (Manufacturing Park) will change to BMP (Business and Manufacturing Park), BMP zoning allows a 1.5 FAR. The previous zoning document does not specify a maximum FAR.
- Zone Changes Figure 25 - M-1 (Light Industrial) areas of the Sycamore Canyon Business Park neighborhood will become BMP (Business and Manufacturing Park).

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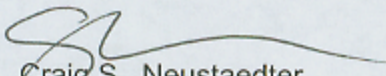
The documents does not specify the future amount of development allowed by the new designations vs. existing.

Intersections in the northwest corner of the City of Moreno Valley (i.e., intersections along Alessandro, Cottonwood, Eucalyptus, ironwood, and Day) could potentially be impacted by future growth and intensification of land use in these two areas. Without knowing the quantities of future land use, the extent of these potential impacts is likewise unknown.

Please include our comments in the EIR or in the upcoming public hearing for the EIR. Should you have any questions, please call Ed Basubas, Senior Engineer at (909) 413-3156.

Sincerely,

Trent D. Pulliam, P.E.
Public Works Director/City Engineer



Craig S. Neustaedter,
City Traffic Engineer

c: Jeff Specter, Planning
File

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